

Patrick J. Reilly
Nevada Bar No. 6103
Ashley N. Schobert
Nevada Bar No. 16317
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106
Telephone: 702.382.2101
Facsimile: 702.382.8135
preilly@bhfs.com
aschobert@bhfs.com

Attorneys for Maximus Education LLC dba Aidvantage

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARLAINA SMITH,

Plaintiff,

v.

TRANS UNION, LLC; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC.; JPMORGAN CHASE BANK, N.A.;
CITIBANK, N.A.; BANK OF AMERICA,
N.A.; MAXIMUS EDUCATION LLC DBA
AIDVANTAGE; AND NAVIENT
SOLUTIONS, LLC,

Defendants.

Case No.: 2:22-cv-02041-GMN-NJK

**ORDER TO
EXTEND DEADLINE TO RESPOND
TO COMPLAINT**

(Second Request)

STIPULATION

Defendant Maximum Education LLC dba Aidvantage (“Aidvantage”), by and through its counsel of record, Patrick J. Reilly, Esq., and Ashley N. Schobert, Esq., of the law firm of Brownstein Hyatt Farber Schreck, LLP, and Plaintiff Marlaina Smith (“Plaintiff”) by and through her counsel of record, George Haines, Esq., and Gerardo Avalos, Esq., of Freedom Law Firm, LLC, hereby stipulate and agree as follows:

1. On January 10, 2023, Plaintiff filed her First Amended Complaint for Damages

1 Under the FCRA, 15 U.S.C. §1681 (the “Complaint”). ECF No. 35.

2 2. On or about January 11, 2023, Plaintiff served the Summons and Complaint on
3 Aidvantage.

4 3. Pursuant to a Stipulation and Order dated February 2, 2023 (ECF No. 48), the
5 current deadline for Aidvantage to respond to Plaintiff’s Complaint is February 15, 2023.

6 4. Plaintiff has agreed to grant an extension for Aidvantage to answer or otherwise
7 plead in response to the Complaint.

8 5. Aidvantage shall have up to, and including, March 1, 2023, in which to answer or
9 otherwise plead in response to the Complaint.

10 6. Aidvantage seeks additional time to respond to the Complaint so that it may gather
11 additional relevant documentation and information, conduct an initial investigation of the
12 Complaint’s allegations in order to formulate a response to the Complaint, and continue to confer
13 with opposing counsel regarding possible settlement of this action.

14 7. This is the second and will be the last request by Aidvantage to respond to the
15 Complaint.

16 8. This stipulation is brought in good faith by all parties and not for purposes of delay.
17 This extension will not result in any undue delay in the administration of this case.

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1 9. This is the second request for extension of time requested by the parties with respect
2 to responding to the Complaint.

3 DATED this 13th day of February, 2023.

 DATED this 13th day of February, 2023.

4 /s/ Patrick J. Reilly

5 Patrick J. Reilly, Esq.
6 Ashley N. Schobert, Esq.
7 BROWNSTEIN HYATT FARBER
8 SCHRECK, LLP
9 100 North City Parkway, Suite 1600
10 Las Vegas, NV 89106

11 Attorneys for Maximus Education LLC
12 dba Aidvantage

/s/ Gerardo Avalos

 George Haines, Esq.
 Gerardo Avalos, Esq.
 FREEDOM LAW FIRM
 8985 S. Eastern Avenue, Suite 350
 Las Vegas, NV 89123

 Attorneys for Marlaina Smith

13 **ORDER**

14 IT IS SO ORDERED.

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16 UNITED STATES MAGISTRATE JUDGE

17 Dated: February 14, 2023
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